

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

-against-

**MMOBUOSI ODOGWU BANYE (a/k/a DOZY
MMOBUOSI), TINGO GROUP, INC., AGRI-
FINTECH HOLDINGS, INC. (f/k/a TINGO
INC.), and TINGO INTERNATIONAL
HOLDINGS, INC.,**

Defendants,

1:23-cv-10928 (JMF)

REQUEST FOR ENTRY OF DEFAULT AS TO DEFENDANTS

To: Daniel Ortiz, Acting Clerk of Court
United States District Court
Southern District of New York

Please enter the default of Defendants Mmobuosi Odogwu Banye (a/k/a Dozy Mmobuosi), Tingo Group, Inc., Agri-Fintech Holdings, Inc., and Tingo International Holdings, Inc. pursuant to Federal Rule of Civil Procedure 55(a) for failure to plead or otherwise defend this action, as demonstrated by the court file in this action and the attached declaration of David Zetlin-Jones.

Dated: June 18, 2024

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION,

/s/ David Zetlin-Jones

David Zetlin-Jones / Michael DiBattista
Securities and Exchange Commission, NY Regional Office
100 Pearl Street
New York, NY 10004
(212) 336-0978 / zetlinjonesj@sec.gov (Zetlin-Jones)